

Eric S. Morrison
284 Plant St.
Groton, CT 06340



DEPARTMENT OF WATER, PROTECTION AND LAND REUSE
OFFICE OF THE SUPERVISOR

FEB 03 2010

February 1, 2010

Re: DEP Proposed Stream Flow Standards and Regulations

Dear Mr. Stacey,

My name is Eric Morrison, I am the golf course superintendent at Shennecossett Golf Course in Groton and I serve on the Board of Directors for the Connecticut Association of Golf Course Superintendents. I am concerned about the negative fiscal impact that the proposed regulations will have on golf courses throughout the state. Many of our member clubs have been pushed to the brink of bankruptcy during the recent economic downturn and the increase in cost associated with this proposal could potentially cause golf courses to close, furthering an overall downturn in the state economy.

The current permitting process costs our member clubs between \$50,000 and \$650,000 each in consulting, legal, infrastructure and permit fees. For many golf clubs in the state, the proposed regulation will create an additional financial burden that they will not be able to sustain. If golf courses close, the re-use of the land could have a greater negative impact on water quality and promote increased usage demands. Shennecossett purchases all of its irrigation water from a municipal supply; the increased stress these regulations may put on municipalities, and assumed increased costs, are of particular concern to me.

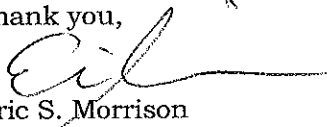
Golf courses serve as open green space, helping to absorb and filter rain water, improve community aesthetics, improve the physical and mental health of some 60,000 golfers state wide. In addition they provide nearly 10,000 jobs and \$400 million in net revenue to the state.

As an organization, golf course superintendents are proud stewards of the environment. We are a self-policing industry when it comes to water usage. This is exemplified in the fact that twelve courses in Connecticut are Certified Audubon Cooperative Sanctuaries, and many more are striving to achieve this designation. I have been involved with certifying two courses in the state; two of the six major competency categories of this program are water conservation and water quality management. Irrigation systems are expensive to operate and maintain, and wet turf conditions provide unacceptable playing surfaces; therefore, we take great care in the amount of water we use. It is in every golf course's best interest to conserve water and CAGCS has worked closely with the DEP to develop the "Best Management Practices for Golf Course Water Use."

Additionally, as was reported at the December 21st Information Hearing, our irrigation practices account for less than one percent by volume, of the registered and/or permitted water diversions in the state. In addition, it has also been reported that less than .4 percent of the State's water bodies are considered at risk. Therefore, based on these facts, CAGCS would respectfully ask that DEP narrow the proposed regulations to focus on the .4 percent of water bodies that are at risk rather than attempt to apply a broad standard to all bodies of water.

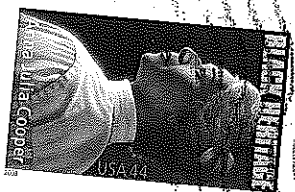
Specifically, CAGCS would ask that DEP exempt golf courses from this proposed regulation because through the use of new technologies and best management practices, golf courses are already achieving the results the department is seeking in this regulation. Furthermore, following the conclusion of the comment period, CAGCS would appreciate the opportunity to meet with the department to discuss the details of an exemption.

Thank you,


Eric S. Morrison

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